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October 24, 2023

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: *Just Play, LLC v. A.S. Plastic Toys Co., Ltd., et al.*
Case No. 19-cv-9399
Status Letter

Dear Judge Ramos:

We represent Plaintiff Just Play, LLC (“Plaintiff”) in the above-referenced action and respectfully submit the instant letter in accordance with the Court’s July 27, 2023 Order. (Dkt. 100).

As indicated in Plaintiff’s August 24, 2023 status letter (Dkt. 101), Plaintiff’s counsel has been communicating with an attorney, who, upon information and belief, previously worked with Mr. Orel and now represents the Orel Defendants. Since August 24, 2023, Plaintiff’s counsel and new counsel for the Orel Defendants have continued to make progress in our settlement discussions and Plaintiff has entered into agreements in principle with seven (7) of the Orel Defendants. While Plaintiff does not anticipate settling with any further Orel Defendants, Plaintiff respectfully requests additional time to finalize settlements and respectfully requests to move for default judgment by December 22, 2023 against all Defendants remaining in this action.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Danielle (Yamali) Futterman

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